

AMENDMENT UNDER 37 C.F.R. § 1.111
U. S. Application No. 09/768,790

REMARKS

Claims 1-14 are all the claims pending in the application. Claims 1, 2, 7-11, and 14 are rejected under 35 U.S.C. § 102(e) as allegedly being anticipated by Chang et al. (U.S. Patent No.: 6,715,126 B1), hereinafter referred to as Chang. Claims 3-6, 12 and 13 are rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Chang in view of Underwood et al. (U.S. Patent No.: 6,697,825 B1), hereinafter referred to as Underwood.

§ 102(e) Rejections (Chang) - Claims 1, 2, 7-11, and 14

Claims 1, 2, 7-11 and 14 are rejected over Chang for the reasons set forth on pages 2-6 of the present Office Action.

With respect to independent claim 1, Applicant amends this claim, as indicated herein, and submits that Chang does not teach or suggest at least “a multimedia file generator for generating to stored data as a single multimedia file using a predetermined format,” as recited in amended claim 1. Chang, contrary to the present invention, is directed to developing a system and method for enabling the generation and presentation of time synchronous content without generating a single file that includes time synchronous content. Chang specifically states that generating time synchronous content in a single file is undesirable and an added complexity. *See col. 2, lines 56 through col. 3, line 19.* Further, even the portion of Chang cited by the Examiner (col. 12, lines 12-18) indicates that Chang is directed to creating a multimedia presentation by display by a media player without first creating a single stream, or file. Therefore, at least based on the foregoing, Applicant submits that the present invention, as recited in claim 1, is patentably distinguishable over Chang.

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Applicant amends claim 9 similar to claim 1, and submits that independent claim 9 is patentable for reasons similar to those set forth above for claim 1. Applicant submits that dependent claims 2, 7, 8, 10, 11, and 14 are patentable at least by virtue of their respective dependencies from independent claims 1 and 9.

§ 103(a) Rejections (Chang/Underwood) - Claims 3-6, 12, and 13

Claims 3-6, 12 and 13 are rejected over Chang in view of Underwood for the reasons set forth on pages 6-9 of the present Office Action. The Examiner alleges that Chang teaches the limitations of claims 3-6, 12, and 13, except the Examiner acknowledges that Chang does not teach “the use of a text aligner for aligning text in a loaded text file or a reproducer for displaying the aligned text on the text window.” *See page 7 of Office Action.* The Examiner, however, alleges that Underwood makes up for the deficiencies of Chang. Applicant traverses these rejections at least for the following reasons.

First, Applicant submits that dependent claims 3-6, 12 and 13 are patentable at least by virtue of their respective dependencies from independent claims 1 and 9. Underwood does not make up for the deficiencies of Chang.

Further, with respect to dependent claim 4, Applicant submits that the Examiner does not even mention the particular limitation “wherein the predetermined units are units of lines determined by a number of pixels set by a user.” Applicant further argues that nowhere does Chang or Underwood, either alone or in combination, even mention that units of lines are determined by a number of pixels set by a user. Therefore, at least based on the foregoing, Applicant submits that dependent claim 4 is patentably distinguishable over the applied references.

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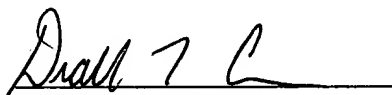
Yet further, with respect to dependent claim 5, Applicant submits that neither of the applied references teach that "the control signal generator checks ... the number of lines of the aligned text," as recited, in part, in claim 5. The Examiner does not even mention this particular limitation, and Underwood, contrary to the Examiner's allegation, does not teach or suggest the above-quoted limitation of claim 5.

Therefore, at least based on the foregoing, Applicant submits that dependent claims 3-6, 12, and 13 are patentable over the applied references, either alone or in combination.

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,


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